

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

AUG 29 2019

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CHRISTOPHER SANTEL MOORE,
aka "Wo";

Defendant.

4:19CR718 RWS/JMB

MOTION FOR PRE-TRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Angie E. Danis, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds for detention, the government requests this Court to consider the following factors pursuant to Title 18, United States Code, Section 3142(g)(1), (2), and (3):

Presumption of Detention

1. The defendant is charged in Count 1 with offenses for which a maximum term of imprisonment of 20 years is prescribed in the Controlled Substances Act Title 21, United States Code, Section 801, et seq.), conspiracy to distribute controlled substances.

2. Accordingly, a rebuttable presumption arises, pursuant to Title 18, United States Code, Section 3142(e)(3), that there are no conditions or combination of conditions which will reasonably assure the safety of any other person and the community.

The Nature and Circumstances of the Offense

3. The defendant is charged in Count I of the Indictment with Conspiracy to Distribute both heroin and fentanyl.

4. The current case involves Christopher Moore acting as a distributor of heroin and fentanyl to multiple, lower-level dealers, who would then redistribute the controlled substances throughout the St. Louis Metropolitan area.

5. Christopher Moore and his cousin, co-defendant Marcus Moore, ran a car wash located at 3840 Cote Brillante, in the City of St. Louis, which served as a base of their criminal enterprise. From this location, Christopher Moore is captured on wiretap surveillance and physical surveillance dealing heroin, fentanyl, and exchanging firearms with subjects who would meet him there.

The Weight of the Evidence Against the Defendant

6. The defendant is a documented member of the Cochran Crips criminal street gang with very close ties to the 41 Delmar Mob criminal street gang, which, in addition to narcotics dealing, has been involved in multiple acts of violence, to include murder, throughout the St. Louis area since as early as the 1990s.

7. The defendant is captured on both audio and video surveillance engaging in his criminal activities and, on pole camera footage from the car wash, is frequently seen in possession of firearms.

**The History and Characteristics of the Defendant and
the Nature and Seriousness of the Danger to the Community**

8. The defendant has multiple felony convictions, the most recent of which involved him being sentenced to 12 years in the Missouri Department of Corrections for an Assault in the Second Degree and Armed Criminal Action.

9. Given the defendant's significant gang affiliations, his criminal history, and the nature of the present offense, the Government believes that the defendant possesses the resources to flee and that he presents a significant danger to the community.

WHEREFORE, the government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

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